

Message

From: Stuber, Robyn [Stuber.Robyn@epa.gov]
Sent: 7/30/2018 5:29:51 PM
To: Morris, Cris@Waterboards [Cris.Morris@waterboards.ca.gov]
CC: Aston, Rosario@Waterboards [Rosario.Aston@waterboards.ca.gov]; Chen, Jau Ren@Waterboards [Jauren.chen@waterboards.ca.gov]; Owens, Cassandra@Waterboards [Cassandra.Owens@waterboards.ca.gov]; Smith, DavidW [Smith.DavidW@epa.gov]
Subject: RE: Castaic

Hi Cris,

Thanks for flagging this again for me. Let's reach a conclusion for you on this during our call tomorrow at 1.

Generally, I believe our office's advice to permitting authorities on this topic has been that if data are acceptable for NPDES reporting from a QA/QC standpoint, the data are acceptable for supporting an affirmative RP decision and the resulting WQBEL. As a permit writer, myself, prefer to not get drawn down into the rabbit hole "representative", particularly where permit writers considering "representative" and using the same information can reach different conclusions. This type of terminology—applied to the RPA—can become a rather gaping loophole in the WQBEL-setting process, depending on how permitting authorities exercise their discretion (e.g., RB5).

As a result, where data meeting QA/QC suggest that a pollutant is greater than the water quality criterion/objective, I typically support a conservative approach to an RP determination and setting a WQBEL. If effluent concentrations for the pollutant are truly low (i.e., the monitored result represents a drastically atypical condition for the effluent), a permittee should be able to meet the new WQBEL. I think this is a solid approach to follow, particularly, when monitoring costs are low and you are looking for consistency across permits issued by the Board.

That said, I'm open to discussing all options for this particular case. I may call Rosario today to get a better understanding of the particulars and be better prepared for our call tomorrow.

Robyn

From: Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
Sent: Monday, July 30, 2018 9:08 AM
To: Stuber, Robyn <Stuber.Robyn@epa.gov>
Cc: Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>; Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>
Subject: RE: Castaic

Robyn, we are trying to move ahead on the Castaic permit. Have you had a chance to look at these Discharger's requests. We have and we propose accepting their recommendations. We are finalizing the draft and will send a copy for your review this week. If you do have reservations about accepting any of these recommendations, please let us know right away.

Thanks much,
Cris

From: Morris, Cris@Waterboards
Sent: Wednesday, July 18, 2018 12:40 PM
To: Robyn Stuber (Stuber.Robyn@epamail.epa.gov) <Stuber.Robyn@epamail.epa.gov>
Cc: Owens, Cassandra <Cassandra.Owens@waterboards.ca.gov>; Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>; Aston, Rosario@Waterboards <rosario.aston@waterboards.ca.gov>; Aston,

Rosario@Waterboards <rosario.aston@waterboards.ca.gov>

Subject: FW: Castaic

Robyn, LADWP has requested that we take a closer look at some of the data that was used for the Castaic RPA (letter dated June 25, 2018). As a follow-up, we asked for some QA/QC backup for the lab data. The letters are attached. We have looked at the proposed modifications to the data used for the RPA and the submitted QA/QC information and we are inclined to accept their recommendations. What are your thoughts? Please let us know so we can move forward with this permit.

Cris

From: Aston, Rosario@Waterboards

Sent: Wednesday, July 18, 2018 8:33 AM

To: Morris, Cris@Waterboards <cris.morris@waterboards.ca.gov>

Cc: Chen, Jau Ren@Waterboards <lauren.chen@waterboards.ca.gov>

Subject: RE: Castaic

Hi Cris,
Here are the letters,

Thanks,
Rosario

From: Morris, Cris@Waterboards

Sent: Wednesday, July 18, 2018 8:16 AM

To: Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>

Cc: Chen, Jau Ren@Waterboards <lauren.chen@waterboards.ca.gov>

Subject: Castaic

Rosario, could you please send me the request letter from LADWP concerning relaxing the limits in the draft permit? I would like to see it and to share it with Robyn.

Thanks,

Cris